

# Nelson Mullins

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May 7, 2007

### Via ECFS

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Washington, DC 20554

Re: Trenholm Road United Methodist Church-CGB-CC-0446;  
Request for Undue Burden Exemption; CG Docket No. 06-181

Dear Ms. Dortch:

In accordance with the November 21, 2006 Public Notice in CG Docket No. 06-181 (DA 06-2329), Trenholm Road United Methodist Church ("Trenholm Road UMC") submits this Reply to the Opposition of the Telecommunications for the Deaf and Hard of Hearing, Inc., National Association for the Deaf, Deaf and Hard of Hearing Consumer Advocacy Network, Hearing Loss Association of America, Association of Late Deafened Adults, Inc., American Association of People with Disabilities, and California Coalition of Agencies Serving the Deaf and Hard of Hearing to Trenholm Road UMC's Request for an undue burden exemption from the FCC's closed captioning regulations.

This Reply supplements and provides additional information and documentation in support of Trenholm Road UMC's Request for an undue burden exemption to the closed captioning requirements for its weekly religious service telecast. The attached Declarations of Stephen F. Barden and Drucilla Brookshire provide specific detailed information regarding Trenholm Road UMC's television ministry. In the alternative, Trenholm Road UMC respectfully requests that the FCC exempt its weekly telecast from the closed captioning requirements pursuant to the exemption for locally produced and distributed non-news programming with no repeat value.

**A. Undue Burden Exemption**

When the FCC established the undue burden exemption to the closed captioning regulations, it determined that the exemption “is intended to be sufficiently flexible to accommodate a wide variety of circumstances for which compliance with our closed captioning requirements would pose a significant financial or technical burden.” See *In the Matter of Closed Captioning and Video Description of Video Programming, Implementation of Section 305 of the Telecommunications Act of 1996, Video Programming Accessibility*, 13 FCC Rcd 3272 (1997) (“Closed Captioning Report and Order”), at ¶198.

Trenholm Road UMC’s initial request for an undue burden exemption from the closed captioning requirements and the Declarations and supporting evidence accompanying this Reply address the following criteria for evaluating these exemption requests:

- *Nature and Cost of Closed Captioning.* The annual cost of airing the weekly telecast is \$43,350. Based on estimates that Trenholm Road UMC has received from captioning providers, closed captioning would increase Trenholm Road UMC’s costs of preparing the weekly telecasts by 20-23 percent.
- *Impact of Captioning on the Operation of the Provider or Program Owner.* Trenholm Road UMC relies solely on volunteer staff to produce its weekly telecast. The volunteer staff must operate within a very short production schedule in order to deliver the final tape to the local ABC affiliate’s regional center located in Charlotte, North Carolina. It would be impractical to insert a closed captioning stage into this tight production schedule.
- *Financial Resources of the Provider or Program Owner.* Trenholm Road UMC receives no revenues as a result of the weekly telecast. Further, Trenholm Road UMC relies on contributions from Church members and other donations to fund its television ministry and its other major endeavors.
- *Type of Operations of the Program Provider.* Trenholm Road UMC was chartered as a not-for-profit organization under South Carolina law. The Church does not generate revenues through its operations.

Finally, Trenholm Road UMC believes that the additional cost of captioning the telecast will force the Church either to reallocate funds from another portion of the Church’s budget or possibly to discontinue its television ministry.

The FCC's Consumer and Governmental Affairs Bureau ("Bureau") has granted undue burden exemptions to similarly-situated petitioners. *See Anglers for Christ Ministries, Inc., New Beginning Ministries, Petitions for Exemption from Closed Captioning Requirements*, 21 FCC Rcd. 10094 (CGB 2006). In *Anglers for Christ Ministries, Inc.* the Bureau granted an undue burden exemption to a non-profit petitioner that did not receive compensation from any video programming distributor and that might be obligated to curtail or terminate its programming given the financial burden of captioning. The Bureau noted that "this confluence of factors strongly suggests that mandated closed captioning would pose an undue burden on such a petitioner." *Id.* at ¶11. The Bureau's reasoning in *Anglers for Christ Ministries, Inc.* mandates a similar conclusion for Trenholm Road UMC.

**B. Exemption for Locally-Produced and Distributed Non-News Programming**

As an alternative to granting an undue burden exemption for the weekly telecast, Trenholm Road UMC respectfully submits that its weekly religious service telecast qualifies for the closed captioning exemption for locally produced and distributed non-news programming with limited repeat value. *See* 47 C.F.R. §79.1(d)(8). In the Closed Captioning Report and Order, the FCC recognized that a captioning requirement was inappropriate for certain locally-produced and distributed programming:

Both cable system operators and broadcasters in their comments have emphasized that there are certain types of locally produced and distributed programs that are of primarily local public interest, have little repeat value and have an inherently fragile economic support system. Much of this programming is produced on a very low budget basis, is not remunerative in itself, is presented essentially as a "public service," and has only a one time appeal to a local audience. Thus, a captioning requirement could result in a sufficient economic burden that such programs are not televised at all. The possibility that the output of such programming might be reduced based on a captioning burden is sufficiently realistic that we believe a narrowly focused exemption for programming of this type is in order. We intend, however, that it apply only to a limited class of truly local materials, including, for example, local parades, local high school and other nonprofessional sports, live unscripted local talk shows, and community theatre productions. We would not include within this category local news, programs readily captioned through the ENR process, or programs that have repeat value. The programming in question would have to be locally created and not networked outside of the local service area or market of a broadcast station or an equivalent area if produced by a cable system operator or other MVPD.

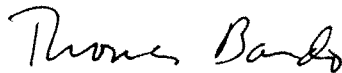
Ms. Marlene H. Dortch, Secretary  
May 7, 2007  
Page 4

A review of the attached Declarations of Stephen F. Barden and Drucilla Brookshire confirms that Trenholm Road UMC's weekly telecast meets many of the criteria cited by the FCC when it established this closed captioning exemption. First, the weekly telecast is a low budget, volunteer operation which generates no income for Trenholm UMC. Second, the telecast is locally produced and available to viewers only in the midlands area of South Carolina. In fact, most of the telecast's viewers are concentrated in two South Carolina counties: Richland and Lexington. Third, as a contributor and donor supported endeavor, the telecast relies on an "inherently fragile economic support system." Fourth, the weekly telecast has little repeat value beyond its local viewing area. Finally, the added financial burden of captioning the telecast may jeopardize the continued viability of this television ministry.

\* \* \*

In sum, based upon its initial Undue Burden Exemption Request, this Reply and the accompanying Declarations and supporting evidence, Trenholm Road UMC respectfully requests an exemption from the FCC's closed captioning regulations.

Sincerely,



Thomas F. Bardo  
*Counsel for Trenholm Road  
United Methodist Church*

TFB:gt  
Enclosures

## DECLARATION

I, Stephen F. Barden, declare under penalty of perjury that the following information is true and correct.

I serve as Business Manager of Trenholm Road United Methodist Church ("Trenholm Road UMC") located at 3401 Trenholm Road, Columbia, South Carolina 29204. I am submitting this Declaration and the attached exhibits in support of Trenholm Road UMC's Reply to the Opposition of the Telecommunications for the Deaf and Hard of Hearing, Inc., National Association for the Deaf, Deaf and Hard of Hearing Consumer Advocacy Network, Hearing Loss Association of America, Association of Late Deafened Adults, Inc., American Association of People with Disabilities, and California Coalition of Agencies Serving the Deaf and Hard of Hearing to Trenholm Road UMC's request for undue burden exemption from the FCC's closed captioning regulations. Trenholm Road UMC's Reply and this Declaration and accompanying exhibits provide additional information and documentation in support of its exemption request.

### **Nature and Cost of the Closed Captions for the Programming**

Trenholm Road UMC produces a 30 minute broadcast of its Sunday morning worship service for airing on WOLO-TV, the local ABC affiliate. Additional specific information regarding Trenholm Road UMC's television ministry is contained in the accompanying Declaration of Drucilla Brookshire, who serves as Volunteer Director of the ministry.

Trenholm Road UMC receives no income from any source as a result of its television ministry. WOLO-TV does not pay Trenholm Road UMC for the right to carry the weekly telecast. The telecast has no commercial sponsors, and Trenholm Road UMC does not solicit any contributions from viewers to support the television ministry.

Rather than serving as a revenue source for Trenholm Road UMC, the telecast represents a significant expense for the church. Specifically, the purchase of 30 minutes of air time for the telecast costs Trenholm Road UMC \$850 per week. The telecast usually airs 51 weeks during the year, resulting in a total annual cost of \$43,350. Given this large expense, Trenholm Road UMC seeks to minimize costs associated with the telecast. As explained in Ms. Brookshire's Declaration, volunteers from the Church congregation film the service and edit the tape for delivery to WOLO-TV. The camera, taping and production equipment that we use to prepare the telecast is old. We recently received an estimate from a broadcast equipment supplier to replace our broadcasting system equipment, which totaled nearly \$200,000. Such replacement cost is prohibitively expensive for the Church. Accordingly, Trenholm Road UMC sees no option other than relying on its existing broadcast equipment at this time.

Trenholm Road UMC believes that the expense of closed captioning the Sunday telecast would represent an undue burden given that we depend on member contributions and other donations for our revenues. As noted above, the annual cost for purchasing air time for the telecast is \$43,350. Trenholm Road UMC has received the following quotations from closed captioning providers for captioning services:

A. Atlantic Coast Communications Proposal

Roll up captioning: \$170 per 30 minute broadcast x 51 weeks = \$8,670

Pop up captioning: \$185 per 30 minute broadcast x 51 weeks = \$9,435

B. Media Images Proposal

\$199 per 30 minute broadcast x 51 weeks - \$10,149

The Atlantic Coast Communications and Media Images proposals are attached as Exhibit 1 to this Declaration. Thus, closed captioning would increase Trenholm Road UMC's costs of preparing the weekly telecasts by approximately 20 - 23 percent.

Although Trenholm Road UMC's television ministry has existed for over 20 years, there is no sustained, dedicated source of funding for this undertaking. Rather, contributions from members of the Trenholm Road UMC congregation have financed the ministry. Attached as Exhibit 2 to this Declaration is the February 23, 2007 report of the Trenholm Road UMC Finance Committee. Trenholm Road UMC's summary 2007 budget is attached to the Finance Committee Report. The Finance Committee Report confirms that the television ministry is supported exclusively by donations:

**Our television ministry** is being funded, once again, by the generous designated gifts of individuals who are passionate about this ministry. There is no guarantee that these individuals will continue to be able to make these generous gifts. If the church is committed to this ministry, we must fund it through the general budget. **The good news:** this ministry is continuing through 2007! (emphasis in original).

Exhibit 3 is a typical example of the donations from Church members and others that have supported the television ministry over the years. We have omitted the personal information from the letter in order to preserve the confidentiality of our members. As you will note, the March 26, 2004 letter enclosed a \$1,000 check to the Trenholm Road UMC with the stipulation that the donation "be utilized for the television ministry...and the possible purchase of equipment for the ministry." Exhibit 3 also serves as an example of the goodwill that the television ministry has generated in its viewing area over the years.

**Financial Resources of the Provider or Program Owner**

Trenholm Road UMC currently does not have the financial resources required to pay the additional cost of closed captioning the weekly broadcast. Trenholm Road UMC relies on contributions from church members and other donations to fund its budget. The 2007 Trenholm Road UMC Budget included in Exhibit 2 shows that 2007 revenues are comprised of "budgeted pledges and gifts" and "unbudgeted gifts." As indicated in the Finance Committee Report attached as Exhibit 2, only member donations enabled Trenholm Road UMC to adopt a 2007 budget that represented an increase over last year's budget. In addition, member contributions and other donations fund Trenholm Road UMC's major endeavors, such as the television ministry.

In order to pay the additional cost of closed captioning, Trenholm Road UMC would require specific member contributions or other donations. Absent such additional revenues, Trenholm Road UMC would have to reallocate funds from other portions of the Church's budget or choose to discontinue the broadcast.

**Type of Operations of the Program Provider**

Trenholm Road UMC is not a commercial enterprise that generates revenues through its operations. Rather, Trenholm Road UMC was chartered as a not-for-profit organization under South Carolina law in 1954.

\* \* \*

In conclusion, if the FCC does not provide Trenholm Road UMC an undue burden exemption from the closed captioning requirements, the Church will be forced to reconsider its commitment to the television ministry. Closed captioning our weekly broadcast would add a significant cost to a project that provides valuable ministry and membership benefits, funded through member contributions and donations, and not from some reliable, dedicated funding source. The prospect of this additional expense would force the Church to make hard financial choices either to reallocate funds from another area of the Church's budget, or conceivably discontinue a ministry which has been ongoing for more than 24 years.

  
Stephen F. Barden

May 7, 2007

Doc# 21250.1 -

# **EXHIBIT 1**





March 2, 2007

Dear Television Program Producer:

As I am sure you already know, effective January 1<sup>st</sup> 2006, the Federal Communications Commission began requiring all English speaking television programs to be closed captioned for the hearing impaired. While there are some exemptions to this requirement, the vast majority of television programs aired on television broadcast stations and cable outlets need to have closed captioning added.

Perhaps you, like many television producers, are currently operating under a temporary exemption while your application to the FCC to be permanently exempt from closed captioning is being reviewed. Once the FCC gives a ruling on your application, you might need the assistance of Atlantic Coast Communications - the company that could potentially be your **closed captioning partner**.

Atlantic Coast Communications can take care of any of your closed captioning needs. We assist program producers located throughout the United States.

I am attaching a fact and rate sheet on our closed captioning services as well as testimonials from a few of our clients. I know you will find our services competitively priced, with a quick turnaround, and attention given to detail. Atlantic Coast Communications has closed captioning projects airing on major network affiliates, local cable companies, as well as national cable channels.

We can turn your project around in under one week and within 48 hours if need be. We also work with all types of media, from Beta SP to Mini DV to DV Cam to DVC Pro to DVD.

We would love to assist you with your close captioning needs. Please don't hesitate to call me if you have any further questions.

Sincerely,

J. Thomas Lamprecht  
President /ACC

ATLANTIC COAST COMMUNICATION, INC.  
3219 LANDMARK STREET • SUITE 3-B • GREENVILLE, NORTH CAROLINA 27834  
VOICE: 252.756.7220 FAX: 252.756.7008 E-MAIL: [production@accradio.com](mailto:production@accradio.com)  
REAL AUDIO WEBSITE: [www.accradio.com](http://www.accradio.com)



### Closed Captioning Services

Atlantic Coast Communications can add close captioning to your video productions, quickly and affordably. We can accommodate quick turn around and work with a variety of formats including Beta SP, DV, Mini DV, DV cam, and DVD.

#### Rates Per Project\*

	<u>Roll up</u>		<u>Pop up</u>	
	30 min.	60 min.	30 min.	60 min.
1 time projects**	\$200.00	\$340.00	\$220.00	\$374.00
Weekly projects**	\$170.00	\$289.00	\$185.00	\$318.00
Daily projects**	\$160.00	\$275.00	\$176.00	\$302.00

\*\*The above rates apply to a turnaround time in excess of more than one week. Please add 10% for projects that have a turnaround time of two days to seven days. Please add 25% for projects that have a turnaround time of less than 24 hours.

\* Rates do not include shipping and media. Shipping rates based upon current UPS rates from Greenville, NC. Media rates based on current rates at [www.americanrecordablemedia.com](http://www.americanrecordablemedia.com).

#### Contact Information

Technical questions, Will Toney, 252-756-7220, ext. 8, [will@accradio.com](mailto:will@accradio.com)  
 Rate & Contract questions, Tom Lamprecht, 252-756-7220, ext. 4, [tom@accradio.com](mailto:tom@accradio.com)  
 Shipping Inquires, Andy Kingsbury, 252-756-7220, ext. 1, [andy@accradio.com](mailto:andy@accradio.com)  
 Billing questions, Colleen Lamprecht, 252-756-7220, ext. 2, [colleen@accradio.com](mailto:colleen@accradio.com)

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 3219 LANDMARK STREET • SUITE 3-B • GREENVILLE, NORTH CAROLINA 27834  
 VOICE: 252.756.7220 FAX: 252.756.7008 E-MAIL: [production@accradio.com](mailto:production@accradio.com)  
 REAL AUDIO WEBSITE: [www.accradio.com](http://www.accradio.com)



## MEDIA IMAGES

4991 Transamerica Dr. • Columbus, Ohio 43228 • Phone (614) 410-3000 • Fax (614) 410-3001

### Closed Captioning Reminder

March 20, 2007

William L. Belvin, Jr.  
Trenholm Road United Methodist Church  
3401 Trenholm Road  
Columbia, SC 29204

Dear Mr. Belvin,

Recently you applied to the FCC for an exemption from the closed captioning requirements for your television program. I understand the financial burden this places on your ministry, however, you may not be aware there is a cost effective alternative to expensive captioning services. Media Images, one of the country's premier religious media companies, has developed a service designed exclusively for ministries, at very reasonable prices.

Closed Captioning - 30 Minute Program - \$199.00  
Closed Captioning - 60 Minute Program - \$299.00

Our easy, inexpensive service will allow you to comply with the FCC closed captioning requirements immediately, or after your exemption expires. We offer duplication to and from most popular tape formats along with fast turn around times. This special pricing is open to ministries only and is not published on our website. To begin using our service, please call us at (614) 410-3000 or visit our website at [www.SmartCaptioning.com](http://www.SmartCaptioning.com).

Blessings,

Adam R. Grover

Media Images Inc.  
4991 Transamerica Dr.  
Columbus, OH 43228  
Phone: (614) 410-3000 ext. 104  
Fax: (614) 410-3001  
[www.SmartCaptioning.com](http://www.SmartCaptioning.com)

## **EXHIBIT 2**



3401 Trenholm Road  
Columbia, SC 29204  
803-254-6695  
www.trumc.org

February 23, 2007

Dear Friends:

**Praise the Lord for He is good! His love endures forever!**

**I am pleased to make a praise report from the Finance Committee!**

You as a congregation have responded to the plea of your Lay Leader, Hayes Mizell, to increase pledges to fund a budget in line with last year's. For that, your ministers, your finance committee, your church council and your staff are sincerely grateful.

In December, we were faced with formulating a budget about thirty-five percent lower than the one for 2006. No one wanted to take that step. Your church council prayed about the problem and decided to appeal to you. And you responded! Your church council adopted a budget for 2007 at a meeting February 13th, which represents an increase over the 2006 Budget.

Your leaders are making a concerted effort this year to communicate more frequently and more openly with all our members about finances and about the operations of our church. In that spirit, I am attaching a short version of that budget for your review. If you would like a more detailed version, please contact Steve Barden in the church office.

You will see that this budget is not perfect. There are three areas that I would like to challenge all of us to improve:

Our **television ministry** is being funded, once again, by the generous designated gifts of individuals who are passionate about this ministry. There is no guarantee that these individuals will continue to be able to make these generous gifts. If our church is Committed to this ministry, we must fund it through the general budget. **The good news:** this ministry is continuing through 2007!

Our budget for **Second Mile Missions** is only \$22,450. Your finance committee and church council feel that this number should be at least ten percent of the budget, as a "tithe" by our church. **The good news:** Our church members are contributing to missions outside this line item, through apportionments, and outside the budget, through programs by our Sunday school classes, United Methodist Women, circles and other groups, as well as through special offerings. For example, we have made generous gifts to Dillon School District 2 through the Corridor of Shame effort, and these gifts are not reflected in the budget.

Our budget for **apportionments represent** only 52 percent of the amounts requested by the Conference. As a United Methodist Church, we should be paying 100 percent of apportionments. **The good news:** Our budget for 2007 reflects a 10 percent increase in apportionments over 2006.

We can and should improve in these three areas. If you have other suggestions, please let me know. You can reach me at home at 783-1624 and at work at 790-5620.

Please allow me to thank each of you personally as I praise God for you and for your support of our church. It is so exciting to be a child of God and to be a member of a congregation that is willing to respond when needs are presented. Let's promise each other to live by these words from a wise Methodist minister: **"God's will done God's way will never lack God's supply,"** If we attempt to do God's will in His way, He will supply our needs. He has demonstrated this to us in recent weeks.

Thank you, my friends. And **praise the Lord, for He is good! His love endures forever!**

Sincerely,

Claire Manning  
Finance Chair



## **EXHIBIT 3**

March 26, 2004

Trenholm Road United Methodist Church  
3401 Trenholm Road  
Columbia, SC 29204

Attention: Pastor Becky Shirley

Dear Becky,

Please find enclosed our check in the amount of \$1,000. As we discussed on the telephone, it is our desire that this money be utilized for the television ministry of TRUMC and the possible purchase of equipment for the ministry.

We make this gift in honor of our (Mary Lou's) mother and our Stepfather (Gene's):

We ask that TRUMC remember the honorarium to both Ruth and Harold.

We believe strongly that the Lord has led us to make this donation to the television ministry this year. You may recall that this ministry was very dear to the heart of Elizabeth Yager (Gene's late Godmother).

Sincerely,



## DECLARATION

I, Drucilla Brookshire, declare under penalty of perjury, that the following information is true and correct.

I am submitting this Declaration in support of Trenholm Road United Methodist Church's ("Trenholm Road UMC") Reply to the Opposition of the Telecommunications for the Deaf and Hard of Hearing, Inc., National Association for the Deaf, Deaf and Hard of Hearing Consumer Advocacy Network, Hearing Loss Association of America, Association of Late Deafened Adults, Inc., American Association of People with Disabilities, and California Coalition of Agencies Servicing the Deaf and Hard of Hearing to Trenholm Road UMC's request for an undue burden exemption from the FCC's closed captioning regulations.

I have been involved in Trenholm Road UMC's television ministry since its planning stages in the early 1980s, always on a volunteer basis. Trenholm Road UMC's weekly broadcasts began in 1983. I served first as a volunteer in the television ministry. For the past 11 years, I have served as volunteer Director of the television ministry.

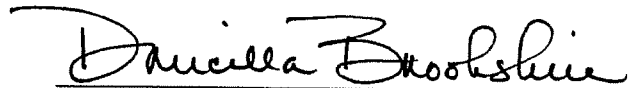
For approximately the last six years, WOLO-TV, the local ABC affiliate, has carried the ministry's weekly broadcast. Before that, the broadcast aired on the local CBS affiliate. According to the July 2005 Nielsen ratings, Trenholm Road UMC's Sunday service telecast reaches approximately 8,000 viewers in the midlands area of South Carolina. Based on the most recent information we received from WOLO-TV, our broadcast is available to viewers in the following South Carolina counties: Richland, Lexington, Saluda, Fairfield, Kershaw, Calhoun, Newberry, Lee, Sumter, Clarendon and Orangeburg. The television households in this area of South Carolina total approximately 377,940. Our viewers are concentrated in Richland and Lexington Counties.

### **Impact on the Operation of the Provider or Program**

The television ministry's weekly broadcast consists of a 30 minute edited version of the previous Sunday service at Trenholm Road UMC. The television ministry is staffed by volunteers, not by Trenholm Road UMC paid staff. Our volunteers tape the Sunday service live. The volunteers then edit the tape according to WOLO-TV's time guidelines. Our volunteers must fit these tasks into their own schedules of work and family commitments.

Our volunteers must produce a final tape of the Sunday service for delivery to WOLO-TV's regional center located in Charlotte, North Carolina, by the following Wednesday. The weekly production cycle therefore is very short. Further, because the television ministry usually airs 51 broadcasts during a year, our schedule does not allow for any lag in broadcasting a Sunday service. For the most part, there is little if any value to our viewers in airing a Sunday service which is several weeks old, particularly around the time of major religious holidays.

I believe that it would be impractical to introduce a closed captioning process into this tight production schedule. Trenholm Road UMC does not own any closed captioning equipment. We therefore would have to purchase captioning services from a third party. In such a scenario, our volunteer staff would have to complete the editing process by Monday morning for shipment to the closed captioning provider. This would represent a significant hardship for our volunteer staff. The captioning company would have to caption the program and return the tape to us for review. Because of the religious nature of our television ministry, we would need to review the captioning to ensure that it did not contain possibly inappropriate mistakes. Finally, as stated above, we must provide the final tape to WOLO-TV no later than Wednesday. One proposal we received from a closed captioning company stated that the company would provide 48 hour turnaround. Such a turnaround would not allow us to meet our Wednesday deadline with WOLO-TV.

A handwritten signature in black ink, reading "Drucilla Brookshire". The signature is written in a cursive style with a large, looping "D" and "B".

Drucilla Brookshire

May 7, 2007

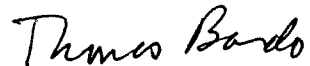
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CERTIFICATE OF SERVICE

I hereby certify that, on this 7th day of May, 2007, a copy of the foregoing Reply to the Opposition filed by the parties listed below was served upon the following such parties by first-class mail, postage prepaid:

Paul O. Gagnier  
Troy F. Tanner  
Danielle C. Burt  
Bingham McCutchen LLP  
2020 K Street, N.W.  
Washington, D.C. 20007

*Counsel for Telecommunications for the Deaf and Hard of Hearing, Inc.*  
*National Association for the Deaf*  
*Deaf and Hard of Hearing Consumer Advocacy Network*  
*Hearing Loss Association of America*  
*Association of Late Deafened Adults, Inc.*  
*American Association of People with Disabilities*  
*California Coalition of Agencies Serving the Deaf and Hard of Hearing*



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Thomas F. Bardo